IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF WISCONSIN GREEN BAY DIVISION

P.H. GLATFELTER COMPANY,)
Movant,)
v.) No. 15-MC-00046-WCG
WINDWARD PROSPECTS LIMITED,)
Respondent.)))

DECLARATION OF JEREMY M. KING

I, JEREMY M. KING, hereby declare, pursuant to 28 U.S.C. § 1746, as follows:

- 1. I am a partner in the law firm of Olshan Frome Wolosky LLP, which is counsel to Respondent Windward Prospects Limited ("Windward"). I am admitted to and in good standing with the Bar of this Court.
- 2. Attached hereto as Exhibit A is a true and correct copy of a Power of Attorney made by Appleton Papers Inc. (n/k/a Appvion Inc.) on July 12, 2004. My understanding is that this document was produced by Appvion February 6, 2015, at bates range APVFOX 021965 to APVFOX 021966.
- 3. The Power of Attorney expressly states that it relates to "claims against the Company's [i.e., Appvion's] past and present insurers...."
- 4. Mr. Tauscher testified to that fact in the transcript submitted by P.H. Glatfelter at Docket No. 40, Exhibit C (35:6-12).

- Q: In connection with the indemnity arrangement, was did Appleton Papers grant any power of attorney to Arjo Wiggin Appleton?
- A: Yes, in or around 2004, Appleton Papers granted an expressed power of attorney to Argo Wiggins Appleton now Windward Prospects to deal with its insurers and enter into settlements with its insurers.

I swear under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: New York, New York September 2, 2015

PEREMYXX KING